

CSM Legal, P.C.

Employment and Litigation Attorneys

60 East 42nd St.
New York, New York 10165

Telephone: (212) 317-1200
Facsimile: (212) 317-1620

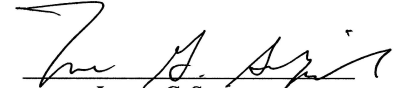
May 19, 2022

BY ECF

Honorable Lorna Schofield
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

By **May 26, 2022**, Defendants shall file a response, not to exceed three pages. So Ordered.

Dated: **May 20, 2022**
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: Espinosa v. Perez et al; 18-cv-08855-LGS-SN (SDNY)

Your Honor:

We represent Plaintiff in the above referenced matter. We write to respectfully request a pre-motion conference in anticipation of Plaintiff's motion to compel Defendant Abraham Perez' compliance with post-judgment discovery obligations pursuant to Fed. R. Civ. P. 37(a) and Local Civil Rule 37.2.

On April 19, 2022, as part of Plaintiff's efforts to enforce his judgment against Defendants, Plaintiff served Defendant Perez with an Information Subpoena via his counsel, Adam Weiss.¹ (A copy of the Information Subpoena and USPS tracking record are collectively annexed hereto as Exhibit A.) Mr. Perez' responses to the Information Subpoena were due April 26, 2022.

Mr. Perez failed to respond to the Information Subpoena, and on May 5, 2022, Plaintiff mailed Defendant Perez a good faith letter via his counsel. (A copy of the good faith letter is annexed hereto as Exhibit B.) To date, Mr. Perez has not responded.

Mr. Perez has demonstrated utter disregard both for the debt he owes Plaintiff and this Court's discovery procedures. As such, and since Mr. Perez won't voluntarily comply with Plaintiff's Information Subpoena, we respectfully request the Court compel his compliance.

Thank you for your attention.

Respectfully Submitted,

/s/Jesse Barton
Jesse Barton, Esq.
CSM Legal, P.C.

Encls.

¹ The Information Subpoena was served via certified mail.

Cc: Abraham Perez (**Via Email**)
c/o Adam Weiss, Esq.